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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **OAKLAND DIVISION**

19 EPIC GAMES, INC.,
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21 Plaintiff, Counter-defendant,
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23 v.
24 APPLE INC.,
25 Defendant, Counterclaimant.

Case No. 4:20-CV-05640-YGR-TSH

**PLAINTIFF'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED PURSUANT TO
CIVIL LOCAL RULE 79-5**

Judge: Hon. Yvonne Gonzalez Rogers

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28 **PLAINTIFF'S ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER PARTY'S
MATERIAL SHOULD BE SEALED**

CASE No. 4:20-CV-05640-YGR-TSH

Pursuant to Civil Local Rules 7-11 and 79-5(f), Plaintiff Epic Games, Inc. (“Epic”) submits this administrative motion to consider whether another party’s material should be sealed with respect to Epic’s Opposition to Apple Inc.’s Motion to Strike Testimony, the Declaration of Michael J. Zaken (“Zaken Declaration”) and Exhibits A-B, all dated March 17, 2025. The document Epic seeks to temporarily file under seal is listed below:

Document	Corresponding Page and Line Number(s)
Plaintiff’s Opposition to Apple Inc.’s Motion to Strike Testimony	Redacted portions as reflected in the highlighted text.

While Epic does not believe sealing is necessary or appropriate, Epic seeks leave to provisionally file the document under seal because it contains information that Apple claims is protected by the attorney-client privilege and/or work-product protection. (*See* Dkt. 1327 at 1.) Epic reserves the right to oppose, under Rule 79-5(f)(4), any submission Apple makes to support sealing under Rule 79-5(f)(3). Epic also hereby provides notice of lodging to all parties and their counsel pursuant to Civil Local Rule 79-5(f).

1 Dated: March 17, 2025

Respectfully submitted,

2 By: /s/ Gary A. Bornstein

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